

September 27, 2018

Indigo Wireless, Inc. E911 Indoor Location Accuracy: 36-Month Progress Report PS Docket 07-114

Indigo Wireless is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMA's. Indigo has been implementing and reporting on, and will continue to implement and report on Accuracy Requirements consistent with the *Parallel Path for Competitive Carriers' Improvement of E911 Location Accuracy Standards* as submitted by the Competitive Carriers Association to the FCC. Indigo Wireless' plan will evolve consistent with improvements and limitations realized by the nationwide CMRS providers, relevant communications vendors, and industry organizations leading the efforts to increase E911 indoor location accuracy.

To date Indigo Wireless has timely performed its 4th Report and Order location accuracy obligations and submitted compliance documentation to the FCC, NENA, APCO, and NASNA.

Indigo Wireless has actively been working with our vendors to take the necessary steps to improve 9-1-1 location accuracy on its network. Our vendors have put forth considerable effort to implement technologies to meet the new regulations stipulated in the FCC's 4th Report and Order to ensure that Indigo Wireless will be compliant. Indigo Wireless plans to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmarks, and then make network improvements and adjustments to existing sites as necessary.

Indigo Wireless is working with Comtech Telecommunications Corp. to make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by Indigo Wireless that has the capability to deliver barometric sensor data.

Indigo Wireless has worked diligently and covered costs to provide public safety with accurate location data for emergency calls. Indigo Wireless is on track to meet

it's 9-1-1 location accuracy obligations and looks forward to improving 9-1-1-location performance to better serve our customers.

Please contact Laura Boyden, Regulatory/Compliance Manager Indigo Wireless, Inc. at 570-723-7314 or lboyden@indigowireless.com, if there are questions concerning this.